

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION AT COLUMBUS**

In re: Eric M and Mindy Schoen : Case No. 07-58035  
:   
Debtors : Chapter 13  
:   
: Judge Caldwell

**SECOND MOTION OF STATE OF OHIO DEPARTMENT OF  
TAXATION TO EXTEND TIME TO RESPOND TO DEBTORS'  
OBJECTION TO PROOF OF CLAIM NO. 25 [DOCKET #116]**

Creditor, the State of Ohio Department of Taxation ("DOT"), hereby moves this Court pursuant to Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure to extend until March 7, 2014 the time in which DOT may respond to the Debtors' Objection to DOT's Proof of Claim No. 25. In support of this motion, DOT states as that the response time was previously extended to January 21, 2014 by agreement of the parties. Specifically, since the last extension, DOT has provided to Debtor additional information supporting its claim, and Debtors' counsel and counsel for DOT are currently exploring a resolution to the issues raised in the objection. A proposed Agreed Order granting the requested extension will be submitted to the Court for its review.

Respectfully submitted,

/s/ Brian M. Gianangeli

Charles A. Mifsud (0070498)

Special Counsel to the Attorney General

Brian M. Gianangeli (0072028)

THE LAW OFFICE OF CHARLES MIFSUD, LLC

6305 Emerald Parkway

Dublin, OH 43016

Phone – (614) 389-5282

Fax – (614) 389-2294

Email – [bgianangeli@mifsudlaw.com](mailto:bgianangeli@mifsudlaw.com)

Attorneys for Creditor,

The State of Ohio Department of Taxation

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served by U.S. mail, postage prepaid, this 21<sup>st</sup> day of January, 2014, upon:

Eric and Mindy Schoen  
5505 Somerset Avenue  
Westerville, OH 43082

Judith M. McInturff  
50 W Broad St #2300  
Columbus, OH 43215

Frank M. Pees  
130 East Wilson Bridge Road  
Suite 200  
Worthington, OH 43085

Asst. US Trustee (Col)  
Office of the US Trustee  
170 North High Street  
Suite 200  
Columbus, OH 43215

/s/ Brian M. Gianangeli  
Brian M. Gianangeli (#0072028)